Remarks/Arguments

This is in response to the Office Action of September 13, 2007. At the time of mailing of the Office Action, claims 1, 3-9 and 21-29 were pending. By the way of this amendment, 1) No claims were cancelled and claims were added, 2) claims 1 and 21 were amended. No new matter was introduced by way of these amendments. Support for the amendments is found in the specification as-filed, and in particular, pages 14-15 and figure 5, among other pages and figures. No new claim fees are necessitated by this amendment. As such, claims 1, 3-9 and 21-29 are now pending. The Applicants respectfully request reconsideration of the claims in view of the following arguments and remarks.

Rejection under 35 U.S.C. § 112 2nd Paragraph:

The Office has rejected claims 21 under 35 U.S.C. § 112 2nd paragraph.

Claim 21 have been amended to overcome the rejection under 35 U.S.C. § 112 2st Paragraph. The Office is requested to withdraw this rejection.

Rejection under 35 U.S.C. § 103(a):

The Office has rejected claims 1 and 21 under 35 USC § 103(a) as allegedly being unpatentable over US Patent No. 7,076,336 (hereinafter MURRAY) in view of Applicants Admitted Prior Art (hereinafter AAPA). This rejection is respectfully traversed because cited prior art fails to disclose, teach, or suggest all limitations of amended claims 1 and 21.

Claims 1 and 21 have been amended to further clarify the communication methods between the application and the physical devices using event notifications generated by the physical devices when there is a change in the status of the device manipulation data.

MURRAY discloses a hardware abstraction layer (HAL) that enables communication between an application and a physical device such as a robotic sensor. MURRAY paragraph 21, lines 14-17 discloses that the behavior calls "get_position" method to retrieve the robot's current position. In other words, the behavior initiates a communication with the robot when the behavior needs to know the current position of the robot. The Applicants respectfully submit that these teachings are different because contrary to the claim recitals, the robot in MURRAY does not send an event to the behavior when there is a change in the position of the robot, to enable the behavior (i.e., application) to initiate a communication with the robot. As recited in claims 1 and 21, the application code segment initiates a communication with the particular type of dimensional control to obtain the current state **only** on receipt of the event notification, that is, the application as recited in claims 1 and 21, does not initiate a communication with the physical device to get the current status until the physical device sends an event to notify the application that a change in the status has occurred. Still further, the fact that MURRAY does not use eventing mechanism is further corroborated by the fact that MURRAY employs a continuous loop (MURRAY column 21, code block 9, do loop in lines 63-66) to scan the robot for any change in the status. The Applicants respectfully submit that it can't be argued that the technique of MURRAY (i.e., scanning the physical device in a continuous loop) is inherently same as eventing mechanism as recited in claims 1 and 21 becuase the technique employed by MURRAY has several disadvantages. The continuous loop uses more computing resources, thereby limiting a number of devices that can be monitors by the application. Furthermore, this technique is no suitable for telematics devices due to limited resource availability.

Still further, as apparent from the do loop in lines 63-66 in column 21 of MURRAY, the do loop "sleeps" during the execution. The Applications respectfully submit that the status of the robot may change more than once during this sleep period; hence causing the application (i.e. the behavior in MURRAY) to miss one status change. On the other hand, since claims 1 and 21 recites use of event mechanism to enable communication between the application and the physical device, the application does not need to continuously scan the physical device for a change in the status. This conserves much needed resources in the computing devices, especially in telematics devices. Furthermore, since an event is sent to the application by the physical devices every time the status changes, there is no chance of missing any change of status in the physical device.

Similarly, AAPA does not disclose use of eventing mechanism to enable communication between the physical device and application.

Therefore, MURRAY and AAPA, either combined or alone, fail to disclose, teach, or suggest all limitations of claims 1 and 21.

Conclusion

The Applicants respectfully submit that all of the pending claims are in condition for allowance. Accordingly, a notice of allowance is respectfully requested.

If the Examiner has any questions concerning the present Amendment, the Examiner is kindly requested to contact Rajeev Madnawat at (408) 774-6927. If any additional fees are due in connection with filing this Amendment, the Commissioner is also authorized to charge Deposit Account No. 50-0805 (Order No. SUNMP152).

Respectfully submitted,
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